

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

Case No.: 6:18-bk-05075

Chapter 13

Janet and Julian Santos

Debtors.

**RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO  
MAINTAIN TIMELY PLAN PAYMENTS**

Comes now the Debtor, by and through Counsel undersigned, and files this Response to Chapter 13 Trustee's Motion to Dismiss (Doc. No. 26), and in support thereof would state as follows:

1. The Trustee has a motion to dismiss for failure to maintain timely plan payments pending, with a total amount due of \$5700 to be paid by January 3, 2019.
2. The Debtor has paid \$2850 since the filing of the motion to dismiss.
3. The Debtor has another payment scheduled for January 11, 2019 for the remaining \$2850.
4. The debtor requests an extension to make the payment on January 11, 2019.

WHEREFORE, the Debtor request this Court deny the Motion to Dismiss or set this matter for hearing and grant such other relief that may be just and proper in the circumstances.

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing has been sent by either electronic transmission or U.S. Mail this 27th day of September, 2018, to: Laurie K. Weatherford, Trustee, PO Box 3450, Winter Park, FL 32790; and to Debtor.

/s/Sophia Dean, Esq.

Florida Bar No. 92295

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